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Counsel for Defendant Verge Agency, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

N.Z., R.M., B.L., S.M., and A.L.,
individually and on behalf of
themselves and all others similarly
situated,

Plaintiffs,

vs.

FENIX INTERNATIONAL LIMITED,
FENIX INTERNET LLC, BOSS
BADDIES LLC, MOXY
MANAGEMENT, UNRULY
AGENCY LLC (also d/b/a DYSRPT
AGENCY), BEHAVE AGENCY LLC,
A.S.H. AGENCY, CONTENT X, INC.,
VERGE AGENCY, INC., AND ELITE
CREATORS LLC,

Defendants.

CASE NO. 8:24-cv-01655-FWS-SSC

**DEFENDANT VERGE AGENCY,
INC.'S NOTICE OF NON-
OPPOSITION TO THE FENIX
DEFENDANTS' (1) MOTION TO
DISMISS FOR FORUM NON
CONVENIENS; AND (2) MOTION
TO COMPEL PLAINTIFFS TO
PROCEED IN THEIR REAL
NAMES**

Date: January 30, 2025
Time: 10:00 a.m.
Crtrm.: 10D

Assigned to Hon. Fred W. Slaughter

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
PLEASE TAKE NOTICE** that Defendant Verge Agency, Inc. does not oppose the
Motion to Dismiss for Forum Non Conveniens (Dkt. 60) or the Motion to Compel

1 Plaintiffs to Proceed in Their Real Names (Dkt. 61) filed by Defendants Fenix
2 International Limited and Fenix Internet LLC.

3 Respectfully submitted,

4 DATED: December 2, 2024

CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

5
6 By: /s/ Younjin Lee
7 Allen Sattler (Admitted *Pro Hac Vice*)
8 Younjin (Jennifer) Lee (Admitted *Pro Hac Vice*)
9 Brent Sedge (*Pro Hac Vice* Forthcoming)
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18 *Counsel for Defendant Verge Agency, Inc.*

CERTIFICATE OF SERVICE

I am over 18 years of age and not a party to this action. I am employed in the County of Orange County, State of California. My business address is 3420 Bristol Street, 6th Floor, Costa Mesa, CA 92626.

On **December 2, 2024**, I caused to be served a true copy of the document(s) entitled:

DEFENDANT VERGE AGENCY, INC.'S NOTICE OF NON-OPPOSITION TO THE FENIX DEFENDANTS' (1) MOTION TO DISMISS FOR FORUM NON CONVENIENS; AND (2) MOTION TO COMPEL PLAINTIFFS TO PROCEED IN THEIR REAL NAMES

on the following individuals by the method(s) indicated below:

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Counsel for Plaintiffs

✓ **BY ELECTRONIC TRANSMISSION:** By causing the document(s) to be transmitted by the Court's PACER filing system to the e-mail addresses of the individuals as indicated above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **December 2, 2024**, in Costa Mesa, California.

/s/ Younjin Lee
Younjin (Jennifer) Lee